

EXHIBIT 30

1

2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

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4 MARK I. SOKOLOW, ET AL.,

5 PLAINTIFFS,

6 -against- Case No:
7 04CV397 (GBD) (RLE)

8 THE PALESTINE LIBERATION ORGANIZATION,
9 ET AL.,

DEFENDANTS.

10 -----X

11

12 DATE: September 5, 2012

13 TIME: 10:35 A.M.

14

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16 DEPOSITION of JAMIE SOKOLOW,
17 taken by the Defendants, pursuant to Notice
18 and to the Federal Rules of Civil
19 Procedure, held at the offices of Morrison
20 & Foerster, 1290 Avenue of the Americas,
21 New York, New York 10104, before Robert X.
22 Shaw, CSR, a Notary Public of the State of
23 New York.

24

25

1 Jamie Sokolow

2 questions.

3 MR. SOLOMON: I am abiding by
4 the rules of this district. I'm
5 stating my objection succinctly; it's
6 is to form. I'm not sure what the
7 question is even asking.

8 Part of my job is to understand
9 the questions that are being asked of
10 the deponent, as well as stating
11 objections. That is covered by the
12 rules. And if you have a problem
13 with what I'm doing, get the judge on
14 the phone.

15 Q. On January 27th, 2002, prior to
16 the explosion that resulted in your
17 injuries, did you see the person or persons
18 who set off the explosion?

19 A. No.

20 Q. Okay. Did you see anyone in
21 the store prior to the explosion?

22 A. There were people in the store
23 while I was there.

24 Q. Okay. And then, after the
25 explosion that occurred on January 27th,

1 Jamie Sokolow

2 did you see, or identify, could you
3 identify the person or persons who
4 detonated the explosion?

5 MR. SOLOMON: Objection to
6 form.

7 You can answer. Go ahead.

8 A. I saw lots of people, no one
9 which I was able to identify.

10 MR. SOLOMON: Just listen to
11 the question and try to answer the
12 question directly. Okay. So.

13 Q. Okay. Did you notice the
14 person outside of the store who set off the
15 explosive device?

16 A. No.

17 Q. Do you know which direction the
18 explosion came from?

19 A. No.

20 Q. Do you know if the explosion
21 came from behind you?

22 MR. SOLOMON: Objection.

23 Go ahead.

24 Q. You can answer.

25 A. No.

1 Jamie Sokolow

2 Arab Bank case as you are in this case?

3 A. Yes.

4 Q. Why did you sue the PA and the
5 PLO?

6 MR. SOLOMON: Objection.

7 Go ahead.

8 A. Again, I was relying on my
9 parents and lawyers to make that decision.

10 Q. Are you aware of any evidence
11 that, um --

12 Well, let me go back and break
13 up the question.

14 Why did you sue the Palestinian
15 Authority, only the Palestinian Authority?

16 MR. SOLOMON: Over my
17 objection, you can answer.

18 A. Again, I was relying on my
19 parents and my lawyers to make those
20 decisions.

21 Q. All right. And why did you sue
22 the Palestinian Liberation Organization?

23 A. I was relying on my parents and
24 my lawyers to make those decisions.

25 Q. Are you aware of any evidence

1 Jamie Sokolow
2 that the Palestinian Authority had anything
3 to do with the bombing in which your family
4 was injured?

5 A. Myself, no.

6 Q. You say, you, yourself, are not
7 aware of any evidence.

12 A. Can you explain that question?

13 MR. SOLOMON: The question is
14 vague; so, I'm going to object.

15 MR. HILL: Let me just take a
16 break.

17 (Whereupon, an off-the-record
18 discussion was held.)

19 Q. Before we took the break, I was
20 trying to find out anything that you know
21 about, um, whether or not the Palestinian
22 Authority had anything to do with the
23 bombing that injured your family.

24 MR. SOLOMON: Is that the
25 question?

1 Jamie Sokolow

2 evidence.

3 So, you can answer the specific
4 question without infringing on the
5 privileged communications; okay?

6 All right.

7 Q. Do you know the evidence?

8 MR. SOLOMON: Over my
9 objection, with that instruction, go
10 ahead.

11 A. No.

12 Q. Okay.

13 Are you aware of any evidence
14 that the Palestinian Authority had anything
15 to do with the bombing in which your family
16 was injured?

17 I'm sorry.

18 MR. SOLOMON: Not the PLO.

19 Q. Another question. Are you
20 aware of any evidence that the Palestine
21 Liberation Organization had anything to do
22 with the bombing that injured your family?

23 A. I don't have any personal
24 evidence.

25 Q. Do you have any evidence, other